

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

COREY ANDERSON,)	
)	No. 08 C 768
Plaintiff,)	
)	JUDGE GETTLEMAN
v.)	
)	Magistrate Judge Denlow
UNKNOWN OFFICERS and the CITY OF)	
CHICAGO,)	
)	
Defendants.)	

**DEFENDANT CITY OF CHICAGO'S MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT**

Defendant City of Chicago ("City"), by its attorney, Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully moves for an extension of time to April 2, 2008 to answer or otherwise plead in response to Plaintiff's complaint. In support of this motion, the City states the following:

1. Plaintiff filed his complaint in the United States District Court, Northern District of Illinois, Eastern Division, on or about February 4, 2008. The City was due to answer on or about February 25, 2008.
2. Undersigned counsel for the City was assigned the case on or about February 21, 2008, the first opportunity that undersigned counsel had to review Plaintiff's complaint.
3. Undersigned counsel for the City mistakenly but in good faith believed that the City had thirty (30) days in which to answer Plaintiff's complaint and thus believed that the City's answer was due on March 5, 2008.
4. The Office of the Corporation Counsel and the Chicago Police Department are still in the process of investigating the allegations in Plaintiff's complaint and compiling the

pertinent records.

5. This motion is the City's first request for an extension of time to answer or otherwise plead. This request is made not to delay the proceedings but rather to allow the City to respond properly to the allegations in Plaintiff's complaint.

6. One of Plaintiff's attorneys, Erica Faaborg of the Law Offices of Blake Horwitz, Ltd., indicated in a faxed letter dated March 5, 2008 that she would not agree to the City's request for an extension of time.

WHEREFORE, Defendant City of Chicago respectfully requests that it be given an extension of time to April 2, 2008 to answer or otherwise plead in response to Plaintiff's complaint; and for any other relief that this Honorable Court deems proper.

Respectfully submitted,

MARA S. GEORGES
Corporation Counsel
City of Chicago

BY: /s/ Thomas J. Aumann
THOMAS J. AUMANN
Assistant Corporation Counsel

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CERTIFICATE OF SERVICE

I hereby certify that I have caused true and correct copies of the above and foregoing **Notice of Motion** and **Defendant City of Chicago's Motion for Extension of Time to Answer or Otherwise Plead to Plaintiff's Complaint** to be served upon Blake Horwitz at lobh@att.net and Erica Faaborg at erica.lobh@gmail.com, via electronic mail, on this 5th day of March, 2008.

/s/ Thomas J. Aumann
THOMAS J. AUMANN
Assistant Corporation Counsel